



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 10, 2023

BY ECF

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Gina Mestre*, 23 Cr. 418 (DLC)

Dear Judge Cote:

The parties write jointly to update the Court regarding the status of the parties' discussions about a possible pretrial resolution and to respectfully request an extension of the deadline for the filing of motions *in limine* and motions pursuant to Rule 404(b). The parties can report that plea discussions have progressed to the point where a framework for a possible plea is in place. Defense counsel will meet with the defendant next week to discuss this framework and are hopeful that a resolution will be reached. Moreover, the prosecution team's court and travel obligations, which begin tomorrow, will consume most, if not all, of next week.

In light of the above, the parties respectfully request a one-week extension of the deadline for trial related motions to November 24, 2023.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

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cc: Matthew J. Kluger, Esq. (Via ECF)
Jodi Morales, Esq. (Via ECF)